

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Randy J. Spencer, Plaintiff,	:	CIVIL ACTION
	:	
	:	No. 1:23-cv-00036
v.	:	
	:	
Matt McSparren, Bob Betzold, Fred	:	
Buckholtz, Regina Deloe, Township	:	
Of Cranberry, and Eric Heil,	:	(electronically filed)
Defendants	:	JURY TRIAL DEMANDED

JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE DISCOVERY
PENDING ORDER OF COURT

Plaintiff, Randy J. Spencer, and Defendants, Matt McSparren, Bob Betzold, Fred Buckholz, Regina Deloe, Township of Cranberry and Eric Heil file this Joint Motion for Extension of Time, and in support thereof respectfully avers:

1. On August 9, 2024, this Court issued an Order extending the case management deadlines. (DOC. 46).
2. Fact discovery was scheduled to end on October 9, 2024. (DOC. 46).
3. Plaintiff was to appear for his deposition on or before September 23, 2024. (DOC. 46).
4. Defendants are to appear for their depositions on or before October 4, 2024. (DOC. 46).
5. All other deadlines are to be determined by the Court. (DOC. 46).
6. The parties notified the Court about discovery disputes. The parties continue to attempt to resolve the disputes without further Court intervention.

7. On August 28, 2024, this Court held a telephonic discovery conference to address Plaintiff's Motion to Compel Discovery and Defendants' responses thereto. (DOC. 47 and 48, respectively).

8. On September 18, 2024, Defendants filed an Emergency Motion to Compel Discovery Responses, to Compel Plaintiff to produce a privilege log, and for a discovery conference. (DOC. 56).

9. A telephonic discovery conference was held on September 19, 2024.

10. Following the discovery conference, the Court granted Defendants' request for a discovery conference and took under advisement Defendants' request for a motion to compel. (DOC. 59).

11. The Court granted the Defendants' request to postpone Plaintiff's deposition pending the Court's resolution of the pending discovery dispute. (DOC. 59).

12. The Court suspended the current discovery deadlines. (DOC. 59).

13. Out of an abundance of caution the parties jointly request to extend the discovery deadline until November 15, 2024, or thirty (30) days after the Court's Order deciding the current discovery dispute, to include the deadline to complete depositions other than Plaintiff's deposition as that deadline will be set by the Court pending the resolution of the discovery deadline.

14. The request is necessary as the Court's resolution of the discovery dispute will impact the parties' ability to conduct depositions in this matter.

WHEREFORE, the parties respectfully request that this Honorable Court grant the requested extension to complete discovery and to complete depositions other than Plaintiff's deposition as that deadline will be set by the Court.

Respectfully submitted,

DATE: October 2, 2024

By: /s/ Andrew W. Norfleet

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DATE: October 2, 2024

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